

UNITED STATES DISTRICT COURT

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for the

District of Maryland

JUN 03 2014

United States of America

v.

AJIBOLA O. EROGBOGBO

Case No.

BY

14-1312TJS

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 11, 2014 in the county of Anne Arundel in the
District of Maryland, the defendant(s) violated:

Code Section

18 U.S.C. § 1951(a)

Offense Description

Robbery

This criminal complaint is based on these facts:

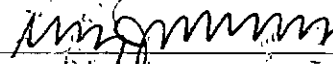
☒ Continued on the attached sheet.

Complainant's signature

Patricia Teakle, Special Agent (FBI)

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/03/2014City and state: Baltimore, Maryland
Judge's signature

Timothy J. Sullivan, U.S. Magistrate Judge

Printed name and title

14-1312TJS

Affidavit of Special Agent Patricia J. Teakle, Federal Bureau of Investigation (FBI)
In Support of
Criminal Complaint: 'U.S. v. Ajibola O. Erogbogbo'

1. On January 9, 2014 at approximately 2349 hours, Anne Arundel County Police (AACO) responded to the Extended Stay Hotel at 1500 Aero Drive Linthicum Heights, Maryland after receiving a 911 call from the hotel clerk and met with an adult female (F1) handcuffed behind her back in the hotel lobby. AACO removed the handcuffs and F1 advised AACO she had arranged a "date" (term for a meeting between a client and a prostitute in an exchange of sexual acts and money) from her online prostitution advertisement with an unknown male at phone number of 443-396-3561. F1 stated that when she opened the door for an unknown thin African-American male, she observed him wearing a vest that read "police" and saw he had a badge in one hand and a gun in the other. The unknown male (UM) told her that she was under arrest and entered her hotel room.
2. UM handcuffed F1 and took her driver's license. F1 advised AACO that UM wrote her information on a yellow pad of paper he had with him. He spoke into a radio on his person and asked her several questions about her involvement in prostitution. The UM demanded her prostitution proceeds. F1 was temporarily un-cuffed during this interview and was able to send a text from her phone to another adult female (F2) in the hotel to request help. When F2 entered the hotel room to assist F1, UM took his gun from the holster and pointed it at F2. UM told F2, "I could have shot you." UM re-cuffed F1 and ordered the females to sit on the bed. After an unsuccessful search for their money, UM ordered F2 to pack her belongings and leave the hotel. He had F2 wrote her phone number (562-761-0317) on a yellow piece of paper from his pad and gave it to him. UM took the handcuffed F1 out of the room towards the side entrance of the hotel and told her she was going to jail. As UM physically escorted F1 to his vehicle, F1 broke free and ran to the front desk yelling "Help Me!", while UM fled the scene. The hotel clerk called 911.
3. The UM was described by hotel personnel and guests as a thin African-American male, wearing a dark jacket, carrying a notepad and holstered weapon. The image of UM was

14-1312TJS

captured on the Extended Stay hotel surveillance video. The video displays the UM arriving the hotel, exiting a dark colored sedan, entering the lobby wearing a vest and carrying a notebook. The video shows the UM physically attempting to escort F1 out of the hotel and the escape of F1 from UM to the lobby. The UM is shown fleeing from the area in the dark sedan. A still image of UM entering the hotel was taken from the video and provided to law enforcement to use in canvassing for the whereabouts of UM.

4. On January 11, 2014 at approximately 2100 hours, AACO was informed by F1 that she posted a new online prostitution advertisement under a new name and new phone number from her new hotel the Extended Stay Hotel located at 939 International Drive Linthicum Heights, Maryland. F1 stated an unknown male she believed to be the UM from the January 9, 2014 incident telephoned her in an attempted to arrange a date with her. F1 advised AACO that the UM called her from Google phone number 301-971-2715. Based on the information provided by F1, members of the Maryland Child Exploitation Task Force (MCETF) arrived in the area of the hotel and set up surveillance. The UM did not appear for the arranged date with F1.
5. While at the Extended Stay Hotel, 939 International Drive, Linthicum Heights, the MCETF came in contact with another adult female (F3) who stated she had posted an online prostitution advertisement and had arranged a "date," earlier that day at approximately 1900 hours with an unknown male purporting himself to be a police officer. F3 advised that after making the date with an unknown male, her adult friend (F4) hid in the closet as a routine safety measure. The unknown male entered the room for the date, identified himself as a police officer and placed F3 in handcuffs. F3 described the unknown male as a slender African-American male with a black vest that read "police", a police belt, one holstered gun on the right side and one gun in a left side drop holster. F3 stated that the unknown male presented a flip wallet with a gold badge and called several times for any additional occupant of the room to come out. When F4 presented herself, the male demanded the females sit on the bed and give him their money, which was proceeds from their commercial sex. F3 produced \$800 and F4 produced \$600 for him. He returned the \$600 to F4 and took the \$800, a can of pepper spray and a vibrator from F3. The male wrote his phone number (443-364-8516) on a piece of yellow paper and told the females to call him if they needed future assistance. F3

14-1312TJS

advised investigators that the male removed his handcuffs from F3 and left the area in a black Nissan Altima sedan.

6. On February 19, 2014 at approximately 2227 hours, during a MCETF prostitution enforcement operation in 15101 Sweitzer Lane Laurel, Maryland, an adult female (F5) informed MCETF she had been recently "robbed" by an unknown thin African-American male with an accent. F5 told investigators that the unknown male informed F5 he was a police officer in the Human Trafficking Unit, showed a badge, and wore a jacket, ballistic vest with a "police" patch, a radio that he spoke into, a handcuff pouch, handcuffs, and a gun in a leather holster. He entered the room for the date and ordered F5 to sit on the bed.
7. After asking F5 several questions of her involvement in prostitution, he advised F5 that the "only way" to avoid arrest was to have sexual intercourse with him. F5 told MCETF that she was intimidated and scared by him. F5 stated that when she refused to remove her clothing, the male threatened to put handcuffs on her. The male ordered F5 to produce a condom, remove her underwear and lie on the bed. She stated he kept his "police stuff on" but took off his handcuffs and gun. The UM then climbed on top of her.
8. While having sexual intercourse with F5, UM asked her "What's wrong?" and "Does it hurt?" F5 stated she was "not into it" and wanted UM "to leave". UM became irritated with F5 and abruptly stopped intercourse with her without ejaculating. UM advised her to keep her "mouth shut" or he would return and arrest her. He provided F5 his phone number (410-921-6698) to call in case she needed assistance or condoms in the future.
9. During the interview with F5, MCETF members showed her a surveillance camera image of the unknown African-American male fitting the description of the UM reported to have been impersonating police during the incident with F1 and F2. F5 stated, "That's him" and agreed to place a consensual call to the Google Voice number 410-921-6698 and left a voicemail message stating that she needed his assistance. A few hours later, UM called back to say he was busy and would "possibly send another officer."
10. On February 20, 2014, F5 posted a new online prostitution advertisement under the direction of the MCETF and the UM contacted her to make a "date." The UM was in telephonic contact with F5 and told her he was on the way. Although F5 had not told the UM her exact location, the UM (Erogbogbo) was observed soon thereafter by several Laurel City Police personnel traversing the Holiday Inn lobby en route to the "date."

14-1312TJS

Erogbogbo attempted to flee. He was intercepted by the police as he was attempting to re-enter his black Nissan Altima with plate 2BH5743 near the hotel. Erogbogbo was found wearing a gold Six Flags Loss Prevention badge near a Smith and Wesson replica BB gun holstered on his belt. The investigation also revealed Ajibola Erogbogbo to be employed by Six Flags Amusement Park in the Loss Prevention unit and to be the registered owner of the black Nissan Altima with plate 2BH5743.

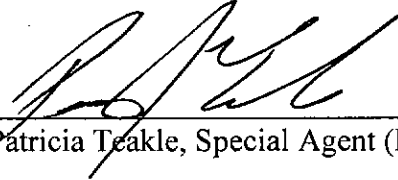
11. Police executed local search warrants of the Nissan Altima and Ajibola Erogbogbo's Laurel, Maryland residence to reveal items including: handcuffs, radios, a 10-code card, pepper spray, a business card with the name Ajibola Erogbogbo with phone number of 404-319-9500, badge holders and a notebook with a yellow notepad inside that contained several names, drivers' license numbers, phone numbers and addresses of females. A piece of yellow note pad paper with the phone number 562-761-0317 (the phone number F2 gave to UM) was recovered in the execution of the warrant. Erogbogbo's mother was interviewed and shown the surveillance image of the UM entering the hotel from the incident with F1 and F2 that F5 identified as the UM in the February 19, 2014 incident. She identified the male in image as Ajibola Erogbogbo, her son, yet she was unfamiliar with the clothing he was wearing.
12. On February 24, 2014, AACO received Google search warrant results that included:
 - a. 443-396-3561 (UM called F1 for a date)
 - b. 301-971-2715 (provided to F1 from UM for a date)
 - c. 443-364-8516 (provided to F3 and F4 from UM)

The results showed that all three numbers were being forwarded to 404-319-9500.

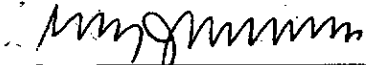
13. The 404-319-9500 phone number is listed on business cards belonging to Ajibola Erogbogbo recovered from the execution of the local search warrants. Ajibola Erogbogbo provided 404-319-9500 to the police at that time of his arrest as his valid contact number.

14-1312TJS

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Patricia Teakle, Special Agent (FBI)

Subscribed and sworn to before me on this 3rd day of June, 2014, at the United States Courthouse in Baltimore, Maryland.


Timothy J. Sullivan
United States Magistrate Judge